

**LOCAL BANKRUPTCY FORM 9013-3**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

Angela L. Sell

**CHAPTER** 13

**CASE NO.** 1 - 18 .bk- 01406

**Debtor(s)**

U.S. Bank Trust National Association  
as Trustee of Cabana Series III Trust

**ADVERSARY NO.**    -    ap-             
(if applicable)

**Plaintiff(s)/Movant(s)**

**vs.**

Angela L. Sell

**Nature of Proceeding:**                                 

MFR - §362(d) and §1301

**Defendant(s)/Respondent(s)**

**Document #:** 48

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

Reason for the continuance.

Counsel for both parties are close to reaching a settlement/agreement resolving the motion. Counsel for debtor would like a short adjournment to be able to speak with his client regarding the terms being offered by the Movant.

Movant's counsel is requesting a new hearing date of May 19, 2020 at 9:30 a.m.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: April 27, 2020

/s/Brian E. Caine

Attorney for Movant

Name: Brian E. Caine

Phone Number: (856) 985-4059

<sup>1</sup> No alterations or interlineations of this document are permitted.